SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP

ONE MANHATTAN WEST NEW YORK, NY 10001

> TEL: (212) 735-3000 FAX: (212) 735-2000 www.skadden.com

DIRECT DIAL
2 | 2-735-24 | 9
DIRECT FAX
9 | 7-777-24 | 9
EMAIL

Douglas.Nemec@skadden.com

September 16, 2022

FIRM/AFFILIATE OFFICES BOSTON CHICAGO HOUSTON LOS ANGELES PALO ALTO WASHINGTON, D.C. WILMINGTON BEIJING BRUSSELS FRANKFURT HONG KONG LONDON MUNICH PARIS SÃO PAULO SFOUL SHANGHAI SINGAPORE TOKYO

TORONTO

BY ECF

The Honorable Stephen L. Crocker United States Magistrate Judge U.S. District Court, Western District of Wisconsin 120 North Henry Street Madison, WI 53703

RE: Cellectar Biosciences, Inc. v. Weichert et al., 21-cv-653 (W.D. Wis.)

Dear Judge Crocker:

In accordance with the Court's August 15 Order (Dkt. 48), we write jointly on behalf of Plaintiff Cellectar Biosciences, Inc., Defendants Jamey Weichert and Anatoly Pinchuk, and proposed Intervenor Wisconsin Alumni Research Foundation to update the Court concerning the parties' efforts to finalize their settlement.

Over the past month, the parties have made a great deal of progress drafting and negotiating long-form agreements that would effectuate the terms of the settlement in principle that had previously been reached. There remain, however, a few final issues the parties need to resolve before the settlement can be consummated.

Accordingly, the parties respectfully request that the Court extend the stay of all proceedings, and that they be permitted to provide the Court with an additional update by no later than September 30 if a Stipulation of Dismissal has not been filed by that date.

We thank the Court for its time and attention to this matter.

Hon. Stephen L. Crocker September 16, 2022 Page 2

SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP

/s/ Douglas R. Nemec

Douglas R. Nemec (pro hac vice) Jordan A. Feirman (pro hac vice) Ryan P. Bisaillon (pro hac vice)

One Manhattan West

New York, NY 10001-8602 Telephone: (212) 735-3000

Email: douglas.nemec@skadden.com jordan.feirman@skadden.com ryan.bisaillon@skadden.com

Marshall J. Schmitt Illinois Bar No. 6184893 Chelsea T. Zielke Wisconsin Bar No. 1101463 MICHAEL BEST & FRIEDRICH LLP 444 West Lake Street, Suite 3200 Chicago, IL 60606-0030 Telephone: 312-222-0800

Email: mjschmitt@michaelbest.com ctzielke@michaelbest.com

Attorneys for Plaintiff
Cellectar Biosciences, Inc.

CASIMIR JONES S.C.

/s/ David A. Casimir

J. Mitchell Jones David A. Casimir 2275 Deming Way, Ste. 310 Middleton, WI 53562 Telephone: (608) 662-1277

Email: jmjones@casimirjones.com dacasimir@casimirjones.com

Attorneys for Defendants Jamey Weichert and Anatoly Pinchuk

PERKINS COIE LLP

/s/ Christopher G. Hanewicz

Christopher G. Hanewicz Michelle M. Kemp Gabrielle E. Bina 33 East Main Street, Suite 201 Madison, WI 53703

Telephone: (608) 663-7460

Email: CHanewicz@perkinscoie.com MKemp@perkinscoie.com GBina@perkinscoie.com

Attorneys for Proposed Intervenor Wisconsin Alumni Research Foundation